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9 *Lead Counsel for Direct Purchaser Plaintiffs*

10  
11 **UNITED STATES DISTRICT COURT**  
12 **NORTHERN DISTRICT OF CALIFORNIA**  
13 **SAN FRANCISCO DIVISION**

14 IN RE: CATHODE RAY TUBE (CRT)  
15 ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

16 This Document Relates to:

17 *Crago, d/b/a Dash Computers, Inc., et al. v.*  
18 *Mitsubishi Electric Corporation, et al., Case*  
19 *No. 14-CV-2058-JST.*

**DECLARATION OF MICHAEL P.  
LEHMANN IN SUPPORT OF DIRECT  
PURCHASER PLAINTIFFS' APPLICATION  
FOR ATTORNEYS' FEES AND EXPENSES  
AND INCENTIVE AWARDS**

Date: June 8, 2017

Time: 2:00 p.m.

Judge: Honorable Jon S. Tigar

Courtroom: 9

1 I, Michael P. Lehmann, hereby declare:

2 1. I am a partner of Hausfeld LLP, Counsel for Direct Purchaser Plaintiffs ("DPPs" or  
3 "Plaintiffs") in this action. I submit this declaration in support of DPPs' joint Application for  
4 Attorneys' Fees and Expenses and Incentive Awards ("Fees and Expense Application") in  
5 connection with the services rendered in this litigation. I make this declaration based on my  
6 personal knowledge and if called as a witness, I could and would competently testify to the matters  
7 stated herein.

8 2. My firm has served as counsel to the Class throughout the course of this litigation.  
9 The background and experience of Hausfeld LLP and its attorneys are summarized in the  
10 curriculum vitae attached hereto as **Exhibit A**.

11 3. Hausfeld LLP has prosecuted this litigation solely on a contingent-fee basis, and has  
12 been at risk that it would not receive any compensation for prosecuting claims against the  
13 defendants. While Hausfeld LLP devoted its time and resources to this matter, it has foregone other  
14 legal work for which it would have been compensated.

15 4. During the pendency of the litigation, Hausfeld LLP performed the following work:  
16 assist with expert opinions for class certification; draft class certification brief and reply; research  
17 summary judgment issues.

18 5. Attached hereto as **Exhibit B** is my firm's total hours and lodestar, computed at  
19 historical rates, from the inception of DPPs' case against the Mitsubishi Electric Defendants and  
20 the Thomson Defendants (Case No. 14-CV-2058-JST, filed May 5, 2014) through October 31,  
21 2016. The total number of hours spent by Hausfeld LLP during this period of time was 214.10,  
22 with a corresponding lodestar of \$182,461.00. This summary was prepared from contemporaneous,  
23 daily time records regularly prepared and maintained by Hausfeld LLP. The lodestar amount  
24 reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional  
25 staff at my law firm for the benefit of the DPP Class. None of these hours were included in  
26 connection with DPPs' first fee and expense application (ECF No. 4055).


27 6. The hourly rates for the attorneys and professional support staff in my firm included  
28 in Exhibit B are the usual and customary hourly rates charged by Hausfeld LLP.

7. Hausfeld LLP has expended a total of \$62.52 in unreimbursed costs and expenses in connection with the prosecution of DPPs' case against the Mitsubishi Electric Defendants and the Thomson Defendants. These costs and expenses are broken down in the chart attached hereto as **Exhibit C**. They were incurred on behalf of DPPs by Hausfeld LLP on a contingent basis and have not been reimbursed. The expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recordation of the expenses incurred. None of these expenses were included in connection with DPPs' first fee and expense application (ECF No. 4055).

8. I have reviewed the time and expenses reported by Hausfeld LLP in this case which are included in this declaration, and I affirm that they are true and accurate.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 21, 2017 at San Francisco, California.

  
Michael P. Lehmann

**ATTESTATION**

I, R. Alexander Saveri, hereby attest, pursuant to United States District Court, Northern District of California Civil Local Rule 5-1(i)(3), that concurrence to the filing of this document has been obtained from the signatory hereto.

By: /s/ R. Alexander Saveri  
R. Alexander Saveri

## **Exhibit A**

# HAUSFELD



BERLIN BOSTON BRUSSELS LONDON NEW YORK PHILADELPHIA SAN FRANCISCO WASHINGTON, DC

[www.hausfeld.com](http://www.hausfeld.com)

## Hausfeld: Global Litigation Solutions Firm Resume





# HAUSFELD

Hausfeld is “the world’s leading antitrust litigation firm.”

– Politico

## Hausfeld Firm Summary

In the last decade, Hausfeld attorneys have won landmark trials, negotiated complex settlements among dozens of defendants, and recovered billions of dollars in cartel recoveries for clients both in and out of court. Renowned for skillful prosecution and resolution of complex and class-action litigation, Hausfeld is the only claimants’ firm to be ranked in the top tier in private enforcement of antitrust/competition law in both the United States and the United Kingdom by the Legal 500.

From our locations in Washington, D.C., Boston, New York, Philadelphia, San Francisco, Berlin, Brussels, and London, Hausfeld contributes to the development of law in the United States and abroad in the areas of antitrust/competition, consumer protection, environmental threats, human and civil rights, mass torts, and securities fraud. Hausfeld attorneys have studied the global integration of markets—and responded with innovative legal theories and a creative approach to claims in developed and emerging markets.

Hausfeld was founded by Michael D. Hausfeld, who is widely recognized as one of the country’s top civil litigators and a leading expert in the fields of private antitrust/competition enforcement and international human rights. The New York Times has described Mr. Hausfeld as one of the nation’s “most prominent antitrust lawyers,” while Washingtonian Magazine characterizes him as a lawyer who is “determined to change the world—and succeeding,” noting that he “consistently brings in the biggest judgments in the history of law.”

### Antitrust and Competition Litigation

Hausfeld’s reputation for leading groundbreaking antitrust class actions in the United States is well-earned. Having helmed more than thirty antitrust class actions, Hausfeld attorneys are prepared to **litigate and manage cases with dozens of defendants** (*In re Blue Cross Blue Shield Antitrust Litigation*, with more than thirty defendants), **negotiate favorable settlements for class members and clients** (*In re Air Cargo Shipping Services Antitrust Litigation*, settlements of more than \$1.2 billion), take on the financial services industry (*In re Foreign Exchange Antitrust Litigation*, with settlements of more than \$2 billion), **take cartelists to trial** (*In re Vitamin C Antitrust Litigation*, trial victory of \$162 million against Chinese manufacturers of vitamin C), and **push legal boundaries where others have not** (*In re NCAA Antitrust Litigation*, another trial victory in which the court found the NCAA rules prohibiting payment of players to be unlawful).

### Consumer Protection Litigation

Hausfeld also pursues consumer protection, defective product, and Lanham Act cases on behalf of a variety of litigants including consumers, entertainers, financial institutions, and other businesses. For example, we obtained class-wide settlements for purchasers of **defective Acer laptops** (*Wolph v. Acer America Corp.*) and **victims of unfair and deceptive practices** (*Radosti v. Envision EMI, LLC* and *In re Tyson Foods, Inc., Chicken Raised Without Antibiotics Consumer Litigation*); and sought compensation for domestic beekeepers and honey packers for **fraudulent mislabeling** of imported honey (*In re Honey Transshipping Litigation*).

# HAUSFELD



## Hausfeld Firm Summary

*continued*

### Financial Services

Hausfeld has been at the forefront of numerous class actions against the financial services industry since 2009, pursuing wrongful conduct that spans the globe. Hausfeld leads two of the largest class actions against the world's biggest banks for manipulation of prices paid in the **Libor** and foreign exchange (**Forex**) markets, in which they obtained **more than \$2 billion in settlements for the class**.

### Mass Tort and Environmental Litigation

Hausfeld attorneys have pursued wide-ranging mass tort cases over the last decade. We have represented **homeowners with defective drywall** (*In re Chinese-Manufactured Drywall Products Liability Litig.*), former **football players who suffered from the long-lasting effects of concussions** (*In re National Football League Players' Concussion Injury Litigation*) **mine workers in southern Africa who contracted silicosis** from their workplace environment – the first case of its kind brought in South Africa, and **victims of dangerous prescription drugs and medical devices**, including women whose hormone replacement therapy caused them to suffer from breast cancer (*In re Prempro Products Liability Litigation*), and patients with defective hip replacements (*In re Stryker Rejuvenate and ABG II Hip Implant Products Liability Litigation*).



# HAUSFELD

“Hausfeld stands out for its ability to provide worldwide solutions, leveraging its network of offices across the US and in Europe.”

– The Legal 500 2016

## Hausfeld: A Global Reach

Hausfeld’s international reach enables it to advise across multiple jurisdictions and pursue claims on behalf of clients worldwide. Hausfeld works closely with clients to deliver outstanding results, while always addressing their business concerns. Hausfeld does so by anticipating issues, considering innovative strategies, and maximizing the outcome of legal disputes in a way that creates shareholder value. Its inventive cross border solutions work to the benefit of the multinational companies it often represents.

### Creative Solutions to Complex Legal Challenges

Hausfeld lawyers consistently apply forward-thinking ideas and creative solutions to the most vexing global legal challenges faced by clients. As a result, the firm’s litigators have developed numerous innovative legal theories that have expanded the quality and availability of legal recourse for claimants around the globe that have a right to seek recovery. Hausfeld’s impact was recently recognized by the *Financial Times*, which awarded Hausfeld the “Most Innovative Law Firm in Dispute Resolution of 2013,” as well as by the *Legal 500* who has ranked Hausfeld as the only top tier claimants firm in private enforcement of antitrust/competition law in both the United States and the United Kingdom. For example, the landmark settlement that Hausfeld negotiated to resolve claims against Parker ITR for antitrust overcharges on marine hose represented the first private resolution of a company’s global cartel liability without any arbitration, mediation, or litigation – creating opportunities never before possible for dispute resolution and providing a new model for global cartel settlements going forward.

### Unmatched Global Resources

The firm combines its U.S. offices on both coasts and vibrant European presence with a broad and deep network around the globe to offer clients the ability to seek redress or confront disputes in every corner of the world and across every industry. With over 70 lawyers in offices in Washington, D.C., Boston, New York, Philadelphia, San Francisco, Berlin, Brussels, and London, Hausfeld is a “market leader for claimant-side competition litigation.”

"Hausfeld LLP is 'one of the most capable plaintiffs' firms involved in the area of civil cartel enforcement', is '[w]idely recognised as a market leader for claimant-side competition litigation... [It is the] market leader in terms of quantity of cases, and also the most advanced in terms of tactical thinking."

– The Legal 500 2014 and 2015

## Antitrust Litigation

### Hausfeld's antitrust litigation experience is unparalleled

Few, if any, U.S. law firms have litigated more class actions on behalf of companies and individuals injured by anticompetitive conduct than Hausfeld. The firm has litigated cases involving price-fixing, price manipulation, monopolization, tying, and bundling, through individual and class representation and has experience across a wide variety of industries, including automotive, banking, chemicals, construction, manufacturing, energy, financial services, food and beverage, health care, mining & metals, pharmaceuticals and life sciences, retail, sports and entertainment, technology, transportation. Clients rely on us for our antitrust expertise and our history of success in the courtroom and at the negotiation table, and the firm does not shy away from challenges, taking on some of the most storied institutions. Hausfeld is not only trusted by its clients, it is trusted by judges to pursue these claims, as evidenced by the fact that the firm has been appointed as lead or co-lead counsel in over 25 antitrust cases in the last decade. In one recent example, Judge Morrison C. England of the Eastern District of California praised Hausfeld for having "the breadth of experience, resources and talent necessary to navigate" cases of import.

Recognizing the firm's antitrust prowess, *Global Competition Review* has opined that Hausfeld is "one of – if not the – top Plaintiffs' antitrust firm in the U.S." *The Legal 500* likewise consistently ranks Hausfeld among the top five firms in the United States for antitrust litigation on behalf of plaintiffs. And in naming Hausfeld to its Plaintiffs' Hot List for the third year in a row in 2014, *The National Law Journal* opined that Hausfeld "punches above its weight" and "isn't afraid to take on firms far larger than its size and deliver results, especially in antitrust litigation."

### Hausfeld has achieved outstanding results in antitrust cases

Hausfeld lawyers have achieved precedent-setting legal decisions and historic trial victories, negotiated some of the world's most complex settlement agreements, and have collectively recovered billions of dollars in settlement and judgments in antitrust cases. Key highlights include:

- ***O'Bannon v. NCAA*, No. 09-cv-03329 (N.D. Cal.)**

Hausfeld serves as lead counsel in this case, which has received considerable press attention and has been hailed as a game-changer for college sports. Following a three-week trial, Hausfeld attained a historic trial victory when the court ruled that the NCAA's rules prohibiting payments to student-athletes for their names, images, and likenesses violate the antitrust laws. This ruling was upheld by the Ninth Circuit Court of Appeals.

- ***In re Air Cargo Shipping Services Antitrust Litig.*, No. 06-md-1775 (E.D.N.Y.)**

Hausfeld serves as co-lead counsel in this case alleging over thirty international airlines engaged in conspiracy to fix the price of air cargo shipping services. The firm negotiated more than **\$1.2 billion** in settlements from over 30 defendants for the class, won certification of the class and defeated the defendants' motions for summary judgment.



# HAUSFELD

## Antitrust Litigation

*continued*

- *In re Foreign Exchange Benchmark Rates Antitrust Litig.*, 13-cv-7789 (S.D.N.Y.)  
Hausfeld serves as co-lead counsel in this case alleging financial institutions participated in a conspiracy to manipulate a key benchmark in the foreign exchange market. To date, the firm has obtained over **\$2 billion** in settlements from **nine defendants**. The case is ongoing against the remaining defendants.
- *In re Vitamin C Antitrust Litig.*, No. 06-md-01738 (E.D.N.Y.)  
Hausfeld serves as co-lead counsel in the first class antitrust case in the United States against Chinese manufacturers. Hausfeld obtained settlements for the class of **\$22.5 million from two of the defendants** – the first after summary judgment, and the second, just before closing arguments at trial. Days later, the jury reached a verdict against the remaining defendants, and the court entered a judgment for **\$162 million** after trebling the damages awarded. Appeals are pending.
- *In re International Air Passenger Surcharge Antitrust Litig.*, No. 06-md-01793 (N.D. Cal.)  
Hausfeld served as co-lead counsel in this case against two international airlines alleged to have fixed fuel surcharges on flights between the United States and United Kingdom. Lawyers at the firm negotiated a ground-breaking **\$200 million** international settlement that provides recovery for both U.S. purchasers under U.S. antitrust laws and U.K. purchasers under U.K. competition laws.
- *In re LIBOR-Based Financial Instruments Antitrust Litig.*, No. 11-md-2262 (S.D.N.Y.)  
Hausfeld serves as co-lead counsel in this case against sixteen of the world's largest financial institutions for conspiring to fix LIBOR, the primary benchmark for short-term interest rates. To date, the firm has obtained **\$120 million** in a settlement with one defendant. The case is ongoing against the remaining defendants.
- *In re Municipal Derivatives Antitrust Litig.*, No. 08-cv-2516 (S.D.N.Y.)  
Hausfeld serves as co-lead counsel in this case against banks, insurance companies, and brokers accused of rigging bids on derivative instruments purchased by municipalities. The firm has obtained over **\$223 million** in settlements with **11 defendants**.
- *In re Automotive Aftermarket Lighting Products Antitrust Litig.*, No. 09-ML-2007 (C.D. Cal.)  
Hausfeld served as co-lead counsel in this case against three manufacturers for participating in an international conspiracy to fix the prices of aftermarket automotive lighting products. The firm obtained over **\$50 million** in settlements.
- *In re Processed Egg Products Antitrust Litig.*, No. 08-cv-04653 (E.D. Pa.)  
Hausfeld serves as co-lead counsel in this case alleging that egg producers, through their trade associations, engaged in a scheme to artificially inflate egg prices by agreeing to restrict the supply of both laying hens and eggs. To date, the firm has obtained nearly **\$60 million** in settlements and won certification of a class of shell egg purchasers. The case is ongoing against the remaining defendants.

# HAUSFELD



## Antitrust Litigation

*continued*

- ***In re Fresh and Process Potatoes Antitrust Litig.*, No. 10-MD-2186 (D. Idaho)**  
Hausfeld serves as chair of the executive committee in this case alleging that potato growers, their cooperatives, processors, and packers conspired to manipulate the price and supply of potatoes. In defeating defendants' motion to dismiss, the firm secured a judicial determination that supply restrictions are not protected conduct under a limited federal antitrust exemption available to certain grower associations—a novel question that had never before been decided by any court. The firm obtained **\$19.5 million** in settlements and valuable injunctive relief prohibiting future production limitation agreements, achieving global resolution of the case.
- ***In re American Express Anti-Steering Rules Antitrust Litig.*, No. 11-md-2221 (E.D.N.Y)**  
As lead counsel, Hausfeld represents a class of merchants and retailers against American Express. The merchants allege that American Express violated antitrust laws by requiring them to accept all American Express cards, and by preventing them from steering their customers to other payment methods.
- ***In re Blue Cross Blue Shield Antitrust Litig.*, No. 13-mdl-2496 (N.D. Ala.)**  
Hausfeld attorneys serve as co-lead counsel and hold court-appointed committee positions in this case against Blue Cross Blue Shield entities, alleging that they illegally agreed not to compete with each other for health insurance subscribers across the United States. Having defeated motions to dismiss, Hausfeld is now marshalling evidence against more than thirty defendants in preparation for summary judgment and trial.
- ***In re Rail Freight Fuel Surcharge Antitrust Litig.*, No. 07-mc-00489 (D.D.C.)**  
Hausfeld is co-lead counsel in this case alleging fuel-surcharge collusion among the nation's largest rail-freight carriers. Leading dozens of firms, Hausfeld mastered the discovery record and obtained class certification in the district court, after which the D.C. Circuit remanded for further consideration of discrete expert issues. This antitrust case is one of the most high-profile class actions in the United States and concerns the claims of some 30,000 shippers, from small businesses to Fortune 500 companies.



## eDiscovery Expertise

When 90% of information is created and stored electronically, success in complex litigation requires legal practitioners with the skill and experience to efficiently manage “eDiscovery”—the process of discovering electronically stored information (or “ESI”). Poorly managed, eDiscovery can be expensive, time-consuming and conflict-ridden. Skillfully managed with civility, cooperation and know-how, it offers enormous potential to litigants, lawyers, and the courts for efficient and effective discovery and case management.

Hausfeld attorneys bring their expertise and skills to achieve the latter result. They are at the forefront of eDiscovery, internationally recognized and frequently called upon to educate other attorneys on both sides of the “v.” on sound ESI discovery practices and emerging technologies. They are experienced in all aspects of eDiscovery from the earliest stages of litigation holds and preservation to the cost-efficient management of large and complex electronic document reviews involving tens of millions of documents.

Rather than waiting for problems to arise, Hausfeld attorneys manage eDiscovery from inception to minimize future disputes and reduce costs to the parties and the court. They work cooperatively with opposing counsel to identify and resolve likely eDiscovery issues at the earliest stages and proactively negotiate ESI preservation, disclosure, search, and production protocols that set clear rules of the game going forward.

### Leading Hausfeld’s eDiscovery efforts are:

**William P. Butterfield**, an internationally recognized authority on eDiscovery, was singled out by Who’s Who Legal for his eDiscovery expertise and by Chambers USA and Chambers Global for litigation/eDiscovery.

Mr. Butterfield chairs the Sedona Conference’s Working Group on Electronic Document Retention and Production and is a member of the Conference’s Working Group on International Electronic Information Management, Discovery and Disclosure. He served as editor-in-chief of *The Case for Cooperation* (2009)—the Sedona Conference’s paper promoting cooperation in discovery, and was a co-editor of *The Sedona Conference® Commentary On Preservation, Identification and Management of Sources of Information that are Not Reasonably Accessible* (2008). He teaches eDiscovery at American University’s Washington College of Law, serves on the advisory board for Georgetown University Law Center’s Advanced E-Discovery Institute, and was a contributor to the casebook *Electronic Discovery and Digital Evidence: Cases and Materials*, authored by former federal district court judge Shira Scheindlin.

**Megan Jones**, a nationally recognized litigator and skilled ESI negotiator, is frequently called upon to lead complex ESI negotiations and to speak at national ESI training events.

Ms. Jones, a member of the Sedona Conference, regularly writes on the topic of e-discovery. She is a co-author of *The Sedona Conference’s highly regarded Glossary: E-Discovery and Digital Information Management* (Dec. 2007) as well as its publication, *Navigating the Vendor Proposal Process*. Her commentary has been published in leading trade and legal journals such as *Law Technology News*, *The National Law Journal*, and the *Federal Courts Law*

# HAUSFELD



## eDiscovery Expertise

*continued*

*Review.* Ms. Jones has testified before the Federal Rules Committee on electronic discovery, participates in high-level legal gatherings such as the invitation-only Duke Law Conference on Implementing Discovery Proportionality Standard, and frequently speaks at leading national ESI conferences, such as the ABA's National E-Discovery Institute and Sedona Conference educational conferences.

**Jeannine Kenney**, an experienced litigator who works in the eDiscovery trenches daily, has navigated detailed, complex and contentious ESI issues from dispute to resolution.

Ms. Kenney, a member of the Sedona Conference's Working Group on Electronic Document Retention and Production, leads and counsels litigation teams in the negotiation of protocols for the preservation, search, and production of ESI in litigation often involving dozens of defendants, negotiates ESI search terms, technology assisted review (predictive coding) methodologies, and database disclosures and productions, and manages complex document reviews using advanced review analytics to speed discovery. She educates other practitioners on eDiscovery realities, serving as a faculty coach to participants in Georgetown University Law Center's weeklong, intensive eDiscovery Training Academy, and speaking at legal conferences. She co-authored a chapter on technology assisted review to appear in the American Bar Association's book, *Perspectives on Predictive Coding*.





## Litigation Achievements

### Significant Trial Victories

While many law firms like to talk about litigation experience, Hausfeld lawyers regularly bring cases to trial—and win. Among our trial victories are some of the largest antitrust cases in the modern era. For example, in *O'Bannon v. NCAA* (N.D. Cal.), we conducted a three-week bench trial before the Chief Judge of the Northern District of California, resulting in a complete victory for college athletes who alleged an illegal agreement among the National Collegiate Athletic Association and its member schools to deny payment to athletes for the commercial licensing of their names, images, and likenesses. Our victory in the O'Bannon litigation followed the successful trial efforts in *Law v. NCAA* (D. Kan.), a case challenging earning restrictions imposed on assistant college coaches in which the jury awarded **\$67 million** to the class plaintiffs that one of our lawyers represented.

In *In re Vitamin C Antitrust Litigation* (E.D.N.Y.), we obtained, on behalf of our direct purchaser clients, a **\$162 million jury verdict** against Chinese pharmaceutical companies who fixed prices and controlled export output of Vitamin C—on the heels of \$22.5 million in settlements with other defendants, which represented the first civil settlements with Chinese companies in a U.S. antitrust cartel case. Years earlier, we took on a global vitamin price-fixing cartel in *In re Vitamins* (D.D.C.), in which we secured a **\$1.1 billion settlement** for a class of vitamin purchasers and then took the remaining defendants to trial, culminating in a **\$148 million jury verdict**.

Our trial experience extends to intellectual property matters and general commercial litigation as well. Recently, we represented entertainment companies that sought to hold internet service provider Cox Communications accountable for willful contributory copyright infringement by ignoring the illegal downloading activity of its users. Following a trial in *BMG Rights Management (US) LLC, v. Cox Enterprises, Inc.* (E.D. Va.), the jury returned a **\$25 million verdict** for our client.

### Exceptional Settlement Results

In less than a decade, Hausfeld has recouped over \$20 billion for clients and the classes they represented. We are proud of our record of successful dispute resolution. Among our settlement achievements, three cases merit special mention. In a case involving allegations of price-fixing among the world's largest airfreight carriers, *In re Air Cargo Shipping Services Antitrust Litigation* (E.D.N.Y.), we negotiated settlements with more than 30 defendants totaling over \$1.2 billion—all in advance of trial. During the same time period, in *In re Foreign Exchange Benchmark Rates Antitrust Litigation* (S.D.N.Y.), we negotiated settlements totaling more than \$2 billion with nine banks accused of conspiring to manipulate prices paid in the foreign-exchange market. And in the global *Marine Hose* matter, we broke new ground with the first private resolution of a company's global cartel liability without any arbitration, mediation, or litigation. That settlement enabled every one of Parker ITR's non-US marine-hose purchasers to recover up to 16% of their total purchases. These cases are just three among dozens of recent landmark settlements across our practice areas.



## Reputation and Leadership in the Antitrust Bar

### Court Commendations

Judges across the country have taken note of Hausfeld's experience and results achieved in antitrust litigation.

**"All class actions generally are more complex than routine actions... But this one is a doozy. This case is now I guess nearly more than ten years old. The discovery as I've noted has been extensive. The motion practice has been extraordinary... The recovery by the class is itself extraordinary. The case, the international aspect of the case is extraordinary. Chasing around the world after all these airlines is an undertaking that took enormous courage."**

**– Judge Brian M. Cogan**

*In re Air Cargo Shipping Services Antitrust Litigation*, No. 06-md-1775 (E.D.N.Y.)

**Comparing Hausfeld's work through trial to Game of Thrones: "where individuals with seemingly long odds overcome unthinkable challenges... For plaintiffs, their trial victory in this adventurous, risky suit, while more than a mere game, is nothing less than a win..."**

**– Magistrate Judge Nathanael M. Cousin**

*O'Bannon v. Nat'l College Athletic Ass'n*, 09-cv-3329 (N.D. Cal.)

**Hausfeld lawyers had achieved "really, an outstanding settlement in which a group of lawyers from two firms coordinated the work... and brought an enormous expertise and then experience in dealing with the case." "[Hausfeld lawyers are] more than competent. They are outstanding."**

**– Judge Charles R. Breyer**

*In re International Air Passenger Surcharge Antitrust Litig.*, No. 06-md-01793 (N.D. Cal.)  
(approving a ground-breaking \$200 million international settlement that provided recovery for both U.S. purchasers under U.S. antitrust laws and U.K. purchasers under U.K. competition laws.)

**Hausfeld has "the breadth of experience, resources and talent necessary to navigate a case of this import." Hausfeld "stands out from the rest."**

**– District Judge Morrison C. England Jr.**

*Four In One v. SK Foods*, No. 08-cv-3017 (E.D. Cal.)



# HAUSFELD

## Reputation and Leadership in the Antitrust Bar

*continued*



THE NATIONAL  
**LAW JOURNAL**



### Awards and Recognitions

#### *Global Competition Review:*

In 2016, Hausfeld was awarded Global Competition Review's "Litigation of the Year – Cartel Prosecution" for its work on *In re Foreign Exchange Antitrust Benchmark Litigation*. The award recognized Hausfeld's success in the Foreign Exchange litigation to date, which has included securing settlements for more than \$2 billion in on behalf of a class of injured foreign exchange investors and overcoming two motions to dismiss in the action.

In 2015, Hausfeld attorneys were awarded Global Competition Review's "Litigation of the Year – Non-Cartel Prosecution," which recognized their trial victory in *O'Bannon v. National Collegiate Athletics Association*, a landmark case brought on behalf of college athletes challenging the NCAA's restrictions on payment for commercial licensing of those athletes' names, images, and likenesses in various media.

#### *National Law Journal:*

In 2015, Hausfeld was named to the *National Law Journal*'s "Plaintiffs Hot List" for the Fourth Year in a Row.

"Hausfeld's creative approaches underpinned key antitrust wins last year, including a trailblazing victory for former college athletes over the use of their likenesses in television broadcasts and video games..." also noting that Hausfeld along with its co-counsel, "nailed down a \$99.5 million settlement with JPMorgan Chase & Co. in January in New York federal court for alleged manipulation of market benchmarks. And it helped land nearly \$440 million in settlements last year, and more than \$900 million thus far, in multidistrict antitrust litigation against air cargo companies."

In 2014, *The National Law Journal* named Hausfeld as one of a select group of America's Elite Trial Lawyers, as determined by "big victories in complex cases that have a wide impact on the law and legal business." The award notes that Hausfeld is among those "doing the most creative and substantial work on the plaintiffs side."

#### *Financial Times:*

In 2015, Michael Hausfeld was recognized by the *Financial Times* as one of the Top 10 Innovative Lawyers in North America.

In 2013, Hausfeld won the *Financial Times* Innovative Lawyer Dispute Resolution Award. The FT states that Hausfeld has "[p]ioneered a unique and market-changing litigation funding structure that improved accessibility and enabled victims to pursue actions with little or no risk."

# HAUSFELD

## Reputation and Leadership in the Antitrust Bar

*continued*



### *Chambers & Partners:*

In 2016, *Chambers & Partners UK* ranked Hausfeld in the top tier among London firms representing private claimants in competition matters, and recognized the firm's accomplishments in Banking Litigation. Chambers observed that the firm was:

"Synonymous with competition damages claims in the UK thanks to its leading role in developing the market in this area. Adept at handling class-style actions and can co-ordinate proceedings for large groups of claimants across different jurisdictions. Well placed to handle both standalone and follow-on actions."

Chambers and Partners has also ranked Hausfeld's U.S. operations in the top tier nationally for antitrust. The publication noted the firm's attributes as including:

- A reputation as a "[m]arket-leading plaintiffs' firm with considerable experience in antitrust class action suits and criminal cartel investigations."
- "[N]umerous successes in the area resulting in major recovery or settlements for its clients."
- Firm Chair Michael Hausfeld's record as "a very successful and able antitrust litigator" and "one of the titans of the Plaintiffs Bar."



### *U.S. News & World Report:*

In 2016, *U.S. News & World Report* – Best Law Firms named Hausfeld to its top tier in both Antitrust Law and Litigation, and among its top tiers in Commercial Litigation. Hausfeld was also recognized in New York, San Francisco, and Washington, DC in Antitrust Law, Litigation, Mass Torts and Commercial Litigation.



### *Legal 500:*

In 2016, Hausfeld was ranked for the eighth year in a row to the top tier nationally for firms in civil litigation and class actions and was also ranked nationally for antitrust – cartel work by *The Legal 500*. The Legal 500 has declared:

"Representing large companies, small and medium-sized businesses, as well as individuals, Washington DC firm Hausfeld LLP remains 'top-notch' in antitrust litigation... Hausfeld LLP is 'one of the most capable plaintiffs' firms involved in the area of civil cartel enforcement', and is handling some of the major cartel-related cases..."

The Legal 500 has also recognized that Hausfeld is a "market transformer," the "most innovative firm with respect to antitrust damages," is "[d]riven by excellence," "anticipates the evolving needs of clients," and delivers "outstanding advice not only in legal terms but also with a true entrepreneurial touch'..."

# HAUSFELD



## Reputation and Leadership in the Antitrust Bar

*continued*



The American Antitrust Institute

### *Concurrences*

In 2015, Hausfeld Partners Michael Hausfeld, Michael Lehmann and Sathya Gosselin, joined by co-authors Gordon Rausser and Gareth Macartney, were elected the winners of the Concurrences' 2015 Antitrust Writing Awards in the Private Enforcement (Academic) category for their article, *Antitrust Class Proceedings - Then and Now*, Research in Law and Economics, Vol. 26, 2014.

### *American Antitrust Institute:*

In 2016, Hausfeld the American Antitrust Institute honored two Hausfeld case teams – In re Air Cargo Shipping Services Antitrust Litig. (E.D.N.Y.) and In re Municipal Derivatives Antitrust Litig. (S.D.N.Y.)—with its top award, for Outstanding Antitrust Litigation Achievement in Private Law Practice. Taken together, these two cases have yielded settlements of over \$1.4 billion to class members after nearly a decade of litigation. The award celebrates private civil actions that provide significant benefits to clients, consumers, or a class and contribute to the positive development of antitrust policy.

In 2015, Hausfeld and fellow trial counsel won the American Antitrust Institute's award for Outstanding Antitrust Litigation Achievement in Private Law Practice for their trial and appellate victories in *O'Bannon v. NCAA*.



# HAUSFELD

## Reputation and Leadership in the Antitrust Bar

*continued*

### Thought Leadership

Hausfeld lawyers do more than litigation. They exercise thought leadership in many fields. Hausfeld lawyers host, lecture at, and participate in leading legal conferences worldwide addressing ground-breaking topics, including: the pursuit of damages actions in the United States and the European Union on behalf of EU and other non-U.S. plaintiffs; nascent private civil enforcement of EU competition laws; application of the FTAIA; the impact of Wal-mart Stores, Inc. v. Dukes and Comcast Corp. v. Behrend on the class certification; reforms to the Federal Civil Rules of Procedure, emerging issues in complex litigation; legal technology and electronic discovery.

Hausfeld attorneys have presented before Congressional subcommittees, regulators, judges, business leaders, in-house counsel, private lawyers, public-interest advocates, elected officials and institutional investors, and hold leadership positions in organizations such as the American Bar Association, the American Antitrust Institute, the Women Antitrust Plaintiffs' Attorney network group, the Sedona Conference and IAALS.

Hausfeld attorneys also regularly organize and facilitate panels and conferences discussing the latest developments and trends in their respective practices and are frequently published in scholarly articles, journals, bulletins and legal treatises. Highlights from these publications and conferences include:

### Recent Articles

- Michael D. Hausfeld and Irving Scher, "**Damage Class Actions After Comcast: A View from the Plaintiffs' Side,**" Antitrust Magazine (Spring 2016).
- James J. Pizzirusso, "**Proving Damages in Consumer Class Actions,**" Consumer Protection Committee, Vol. 22/ No. 1, ABA Section of Antitrust Law (Mar. 2016).
- Brent Landau and Gary Smith, "**Bundling Claims Under Section 1 of the Sherman Act: Focusing on Firms' Abilities to Create Anticompetitive Effects in a Market, Rather Than Their Share of It,**" Antitrust Health Care Chronicle, Vol. 28/ No. 1, ABA Section of Antitrust Law (Jan. 2015).
- Michael D. Hausfeld, Gordon C. Rausser, Gareth J. Macartney, Michael P. Lehmann, Sathya S. Gosselin, "**Antitrust Class Proceedings – Then and Now,**" Research in Law and Economics (Vol. 26, 2014) (Recipient of *Concurrences'* 2015 Antitrust Writing Award for Private Enforcement (Academic) Category).
- Brent Landau and Brian Ratner, "**Chapter 39: USA,**" The International Comparative Legal Guide to Cartels & Leniency (Ch. 39, 2014).
- Michael Hausfeld and Brian Ratner, "**Prosecuting Class Actions and Group Litigation – Understanding the Rise of International Class and Collective Action Litigation and How this Leads to Classes that Span International Borders,**" World Class Actions (Ch. 26, 2012)
- Michael Hausfeld and Kristen Ward Broz, "**The Business of American Courts in Kiobel,**" JURIST – Sidebar (Oct. 2012).



# HAUSFELD



## Scott Martin

Partner

### NEW YORK, NY

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Scott Martin has played a major role in defending many of the largest antitrust class action cases of the last two decades and has negotiated resolutions of numerous regulatory investigations and actions on behalf of corporate clients. He has been consistently recognized for years as one of the leading antitrust litigators in New York and the country by every significant ranking organization, including *The Best Lawyers in America* (Antitrust Law and Litigation - Antitrust), *Chambers USA Guide*, *International Who's Who of Competition Lawyers and Economists* and *International Who's Who of Business Lawyers*, and *Super Lawyers*, among others. Clients, colleagues, and adversaries have referred to Scott as a "terrifically talented and surefooted" litigator" and "an astute operator who always adds value to proceedings" while also serving as a "business-oriented lawyer who looks to see what the overall issues are and determines how best to approach the representation of those interests, including common sense approaches to exit strategies where feasible."

Scott's practice extends to bench and jury trials in both federal and state courts, complex federal multidistrict actions, class actions involving direct and indirect purchasers, *parens partial* cases, FTC and DOJ investigations as well as other regulatory actions, and *qui tam* litigation. He also has two decades of counseling experience across a broad range of industries on pricing, distribution, competitive intelligence, joint ventures, and non-compete agreements, among other competition issues, and has designed antitrust compliance programs for some of the world's largest corporations.

Scott is a frequent lecturer and panelist who has also published practical advice on various antitrust topics. In addition to serving on the Editorial Board of *Antitrust Law Developments* and *Competition Law360*, Scott is a co-editor (along with Irving Scher of Hausfeld) of the forthcoming edition of the multi-volume treatise *Antitrust Adviser*. Scott is a member of the Executive Committee of the New York State Bar Association's Antitrust Section, and he has long been active in the leadership of the American Bar Association Section of Antitrust Law (including having served as chair of the Trial Practice Committee and the Business Torts & Civil RICO Committee, among other positions).

# HAUSFELD



## SCOTT MARTIN

Having adopted New York as his home for over 20 years, Scott owns a small business in Manhattan and also serves on the Board of Directors of WHEDco, a leading non-profit organization dedicated to creating opportunities in the Bronx.

### EDUCATION

Stanford Law School, J.D., 1990

Stanford University, A.B., 1987

### BAR ADMISSIONS

New York

District of Columbia

# HAUSFELD



## Bonny E. Sweeney

Partner

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Bonny E. Sweeney, a leading antitrust litigator, is a Partner in the San Francisco office of Hausfeld.

Bonny has represented clients in some of the most significant antitrust cases in the United States in the last 20 years. She previously served as co-lead counsel on behalf of a class of merchants in *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litig.* (E.D.N.Y.), a sprawling litigation against the world's largest credit card companies. Bonny, together with Hausfeld, also served as co-lead counsel in *In re Aftermarket Auto Lights Antitrust Litig.* (C.D. Cal.), which settled for more than \$50 million, and in which counsel obtained a landmark decision denying a leniency applicant's bid for reduced civil damages under the Antitrust Criminal Penalty Enhancement and Reform Act (ACPERA), because the defendant had not provided satisfactory or timely cooperation under the statute.

*The Daily Journal* recognized these legal achievements in May 2014, naming Bonny as one of the Top Women Lawyers in its Annual List of 100 Leading Women Lawyers in California. Bonny was also named as a Local Litigation Star in Antitrust in 2016 by *Benchmark Litigation Rankings*, and as Litigator of the Week by *Global Competition Review* in 2014. Bonny served as lead trial counsel for the plaintiff class in *In re iPod iTunes Antitrust Litig.*, which was tried to a jury in 2014, and was also one of the trial lawyers in *Law v. NCAA/Hall v. NCAA/Schreiber v. NCAA* (D. Kan.), in which the jury awarded \$67 million to three classes of college coaches. She has participated in the successful prosecution and settlement of numerous other antitrust and unfair competition cases, including *In re Currency Conversion Fee Antitrust Litig.* (S.D.N.Y.), which settled for \$336 million.

Bonny currently serves as lead or co-lead counsel in several pending antitrust class actions, including *In re Contact Lens Antitrust Litig.* (M.D. Fla.), *In re Packaged Seafood Products Antitrust Litig.* (S.D. Cal.), and *In re Parking Heaters Antitrust Litig.* (E.D.N.Y.).

# HAUSFELD



## BONNY E. SWEENEY

### EDUCATION

Case Western Reserve University School of Law, J.D., *summa cum laude*, 1988, Editor, *Law Review*, Member, Order of the Coif

Cornell University, M.A., 1985

Beijing Language Institute, Chinese Language Certificate, 1982

Whittier College, B.A., 1981

### BAR ADMISSIONS

California

Massachusetts

Ninth Circuit Court of Appeals

Tenth Circuit Court of Appeals

United States Supreme Court



# HAUSFELD



## Michael P. Lehmann

Partner

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Over a career that has spanned nearly forty years, Michael Lehmann has litigated big and small civil cases, representing plaintiffs and, in several cases, defendants. This experience gives him a special perspective that enables him to evaluate the strengths and weaknesses of a case in a well-rounded manner and serve his clients by focusing on cases and claims with respect to which the client has a fair chance of prevailing. One of his strengths is brief-writing and he has penned many a successful brief before trial and appellate courts. He is respected by his peers in the legal community for being a savvy, meticulous litigator who treats his fellow lawyers, as well as clients, with civility and respect.

Michael is primarily a business litigator, with an emphasis in the antitrust field. He has been involved in numerous class action antitrust cases, as well as individual cases. He has also done extensive regulatory work for clients before federal and state agencies. In addition, he has participated in numerous international and domestic arbitrations. He has published several articles on antitrust and other matters and has been recognized either generally or in the antitrust field in the publications Best Lawyers in America and San Francisco's Best Lawyers, as a Northern California Superlawyer, and is the recipient of a Martindale-Hubbell AV Preeminent rating.

### EDUCATION

J.D. 1977, Hastings College of the Law

A.B. 1974, University of California at Berkeley

### BAR ADMISSIONS

California

# HAUSFELD



## Christopher L. Lebsack

Partner

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A partner at Hausfeld, Chris represents consumers and businesses in complex legal disputes in a variety of jurisdictions across the globe. Chris regularly consults with clients, trade associations, and law firms about competition issues and legal strategies that span international borders.

He is a member of the firm's antitrust and financial services groups and represents banks, insurance companies, and manufacturers and distributors of all types of products in litigation around the world. Chris enjoys crafting creative legal solutions for his clients, and where necessary, advocating new and novel legal theories to advance his clients' interests.

Representative recent cases include:

- *In Re: Transpacific Passenger Air Transportation Antitrust Litig.*, N.D. Cal. Case No. 07-CV-5634-CRB (lead counsel for plaintiffs);
- *In Re: Korean Ramen Antitrust Litig.*, N.D. Cal. Case No. C-13-04115-WHO (lead counsel for plaintiffs);
- *A.H.R.E., Inc. v. Hankook Jungsoo Industrial Co. Ltd.*, E.D.Va. Case No. 1:13-cv-1503 (LMB/JFA) (counsel for defendant Hankook);
- *Woori Bank v. Citigroup, Inc.*, 2d Cir. Case No. 14-3329 (counsel for Woori Bank).

Over the last 10 years, Chris has also represented a number of individuals, the California Teachers' Association and the National Education Association in litigation pending before the California Supreme Court, the Ninth Circuit Court of Appeals, and the United States Supreme Court concerning the right of gays and lesbians to marry the partner of their choice.



# HAUSFELD



## **CHRISTOPHER L. LEBSOCK**

Chris represents clients in the trial courts throughout the United States and on appeal.

He graduated from University of California, Hastings College of the Law, in 1996. Before that, he majored in Economics at the University of Colorado, Boulder. Chris is a life-long member of the Phi Beta Kappa Society. He is admitted to practice before the California and United States Supreme Courts, the Second and Ninth Circuit Courts of Appeal, and the District Courts for the Northern, Eastern, and Central Districts of California.

### **EDUCATION**

University of California, Hastings College of the Law, J.D., 1996

University of Colorado, Boulder, B.A., 1993; Phi Beta Kappa

### **BAR ADMISSIONS**

California Supreme Court

Northern District of California

Eastern District of California

Central District of California

Ninth Circuit Court of Appeals

# HAUSFELD



## Hilary K. Scherrer

Partner

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Hilary Scherrer is a partner in Hausfeld's Washington, DC office. She has extensive experience representing businesses and individuals in antitrust, consumer fraud, and other complex litigation matters, at both the trial court and appellate court levels. She also has experience working on international arbitration and settlement matters.

Hilary has been named one of the country's top "Antitrust Litigation Stars," one of the District of Columbia's "Local Litigation Stars," and one of the "Top 150 Women in Litigation" by Benchmark Plaintiff, a definitive guide to America's leading plaintiff-side litigation firms and attorneys. She has also been featured by The Plaintiffs' Hot List, an annual list of the nation's top plaintiff-side firms prepared by the National Law Journal. In 2015, *The Legal 500*, which provides comprehensive worldwide coverage on legal services, ranked Hausfeld as top tier in Civil Litigation/Class Actions, stating that "*Michael Hausfeld and Hilary Scherrer are 'smart strategic thinkers.'*"

Hilary is currently involved in several high-profile antitrust cases. She is leading *In re NCAA Student-Athlete Name & Likeness Licensing Litigation* (N.D. Cal.), also known as the *O'Bannon case*, in which current and former student-athletes allege that the NCAA and others conspired to pay nothing for the use of athletes' names, images, and likenesses. The case, which has garnered significant press attention, is being viewed as a potential game-changer for college sports.

Hilary is also leading *In re Libor-Based Financial Instruments Antitrust Litigation* (S.D.N.Y.), a class action lawsuit alleging a global conspiracy by some of the world's largest financial institutions to manipulate LIBOR. The manipulation of LIBOR, which is the primary benchmark for short-term interest rates for trillions of dollars worth of financial transactions worldwide, is alleged to have caused billions of dollars in damage to municipalities, businesses, and investors.

# HAUSFELD

## HILARY K. SCHERRER

Hilary's other current cases include *In re Air Cargo Antitrust Litigation* (E.D.N.Y.), a massive class action alleging a global conspiracy to set fuel surcharges by over thirty defendant air carriers in which there are over \$1 billion in settlements to date, and *In re Chocolate Confectionary Antitrust Litigation* (M.D. Pa.), a case alleging that the major chocolate manufacturers, Nestle, Mars, Cadbury and Hershey conspired to fix the prices of chocolate candy.

During her career, Hilary has worked on other significant antitrust cases, including: *In re Polyurethane Foam Antitrust Litigation* (N.D. Ohio); *In re Municipal Derivatives Antitrust Litigation* (S.D.N.Y.); *In re Publication Paper Antitrust Litigation* (D. Conn.); *In re Construction Flat Glass II Antitrust Litigation* (W.D. Pa.); *Animalfeeds International Corp. et al. v. Stolt-Nielsen SA* (arbitration); *In re Oriented Strand Board Antitrust Litigation* (E.D. Pa.); *In re International Air Transportation Surcharge Litigation* (N.D. Cal.); *Thomas & Thomas Rodmakers, Inc. v. Newport Adhesives and Composites, Inc. et al.* (C.D. Cal.); and *In re Microcrystalline Cellulose Antitrust Litigation* (E.D. Pa.).

In addition to her work on antitrust cases, Hilary was involved in *Schwab v. Philip Morris USA et al.* (E.D.N.Y.), in which the plaintiffs alleged a RICO conspiracy and fraud in connection with the marketing and sale of "light" cigarettes. She also represented Holocaust victims in a breach of contract case alleging certain German corporations failed to pay appropriate interest due on their payments to a reparations fund.

## EDUCATION

American University Washington College of Law, J.D., *cum laude*, 2000  
University of Colorado, Boulder, B.A., 1996

## BAR ADMISSIONS

California  
District of Columbia

# HAUSFELD



## Jeannine M. Kenney

Associate

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Jeannine M. Kenney is an associate in Hausfeld's Washington D.C. office, licensed in both Pennsylvania and the District of Columbia.

Jeannine's practice focuses primarily on private enforcement of federal and state antitrust laws. She was named a Rising Star in antitrust litigation in 2015 and 2016, an honor awarded to fewer than five percent of practitioners in the state.

Representative antitrust matters include:

- *In re Foreign Exchange Benchmark Rates Antitrust Litig.*, 13-cv-7789 (S.D.N.Y.), alleging a conspiracy among leading financial institutions to manipulate the foreign exchange market, in which Hausfeld serves as co-lead interim counsel and has obtained more than \$2 billion in settlements to date.
- *In re Generic Digoxin and Doxycycline Antitrust Litigation*, No. 16-md-2724 (E.D. Pa.) representing a class of end-payers alleging generic drug manufacturers and marketers conspired to unlawfully inflate the price of critical medications.
- *In re Domestic Airline Travel Antitrust Litig.*, No. 15-mc-1404 (D.D.C.) alleging major airlines conspired to reduce capacity to artificially inflate the price of domestic air travel, in which Hausfeld serves as interim co-lead counsel.
- *In re Blue Cross Blue Shield Antitrust Litig.*, No. 13-mdl-2496 (N.D. Ala.), representing subscribers alleging dozens of Blue Cross Blue Shield entities entered into an unlawful agreement not to compete, in which Hausfeld serves as co-lead counsel and discovery chair; Jeannine works primarily on e-discovery in the matter.
- *In re Processed Egg Products Antitrust Litig.*, No. 08-md-2002 (E.D. Pa.), representing egg purchasers alleging egg producers and distributors entered into an unlawful agreement to restrict egg supplies, in which Hausfeld serves as co-lead counsel and has obtained nearly \$60 million in settlements to date, secured class certification of a shell egg class, and obtained summary judgment that eliminated a primary affirmative defense.



# HAUSFELD



## JEANNINE M. KENNEY

- *In re Fresh and Process Potatoes Antitrust Litig.*, No. 10-MD-2186 (D. Idaho), which alleged more than 24 potato growers, distributors, and processor defendants entered into an unlawful agreement to restrict potato supplies to inflate the price. Hausfeld chaired the 10-member Plaintiffs' Executive Committee and secured a ground-breaking ruling on a novel question of law undermining a key defense in the case, ultimately obtaining a global settlement of nearly \$20 million and significant injunctive relief. Jeannine managed the 20-plus defendant case from discovery through resolution, including all e-discovery matters.

Jeannine's practice also includes mass torts and other non-antitrust matters. She served as court-appointed Plaintiffs' Liaison Counsel in *In re National Football League Players' Concussion Injury Litigation*, MDL 2323 (E.D. Pa.) and represented hundreds of former NFL players suffering from long-term or permanent neurological or cognitive impairments as a result of head injuries during NFL play and who alleged the League hid from them the serious risks of head trauma. She also represents a putative class of former college athletes in *McCants v. National Collegiate Athletic Association, et al.*, No. 15-cv-176 (M.D.N.C.) who allege the University of North Carolina offered them fraudulent classes and, for decades, concealed that fraud.

Jeannine is adept and experienced in managing all aspects and phases of e-discovery, the complex process of discovering and producing electronically stored information (ESI). She routinely navigates detailed, complex and contentious ESI issues from dispute to resolution, including briefing and arguing e-discovery motions when necessary. A member of the Sedona Conference's Working Group on Electronic Document Retention and Production, Jeannine counsels Hausfeld's litigation teams in negotiations relating to preservation, search, and production of ESI in cases often involving dozens of defendants, negotiates ESI search terms, technology assisted review (predictive coding) methodologies, and database disclosures and productions, and manages complex document reviews using advanced review analytics to speed discovery. She educates other practitioners on e-discovery realities, serving as a faculty coach to participants in Georgetown University's intensive eDiscovery Training Academy, and speaking at conferences regarding the complexities and ethical quandaries involved in the search for and production of ESI and the importance of cooperation among the parties. She co-authored a chapter on technology assisted review—advanced methodologies used to more effectively and efficiently locate responsive ESI—to appear in the American Bar Association's upcoming publication, *Perspectives on Predictive Coding*.

Jeannine joined the firm in 2009. From 2010 to 2011, she clerked for the Honorable Cynthia M. Rufe, United States District Court Judge, Eastern District of Pennsylvania. While attending the Georgetown University Law Center, from which she graduated *magna cum laude*, Jeannine was a member of the Georgetown Law Journal and a member of Georgetown's highly regarded Appellate Litigation Clinic, in which she received the International Academy of Trial Lawyers' Student Advocacy Award for her work on *Lytes v. DC Water* and

# HAUSFELD



## JEANNINE M. KENNEY

Sewer Authority, No. 08-7002 (D.C. Cir. 2009), which she argued as amicus curiae before the United States Court of Appeals for the District of Columbia.

Jeannine brings to her legal work nearly two decades of experience in public policy spanning a wide range of legislative and regulatory fields, including agriculture, food safety, telecommunications, and financial services, among others, advocating for the public interest and consumers. For nearly five years, she worked as a legislative assistant for two United States Senators. As a Senior Policy Analyst for Consumers Union, publisher of *Consumer Reports*, she advocated for consumer interests before Congress and federal agencies, testifying before congressional committees, appearing as a speaker at Federal Trade Commission events, and presenting oral and written testimony to federal regulatory agencies. She has been widely quoted in print media, including the *Washington Post*, the *New York Times*, and *USA Today*, and has appeared on national cable and broadcast programs on consumer issues ranging from anticompetitive mergers, unfair consumer services contracts, consumer access to competitive and affordable telecommunications services, and financial privacy. Jeannine also served as an appointed member of two federal advisory committees related to pesticide safety. Between stints at Consumers Union, she served as the Vice President of Domestic Affairs for the National Cooperative Business Association, representing member-owned consumer, producer, and purchasing cooperatives.

## EDUCATION

Georgetown University Law Center J.D., (*magna cum laude*, Order of the Coif), 2009

University of Wisconsin-Madison, B.A., Political Science and Economics (with distinction), 1988

## BAR ADMISSIONS

Commonwealth of Pennsylvania

District of Columbia

District Court for the Eastern District of Pennsylvania

District Court for the District of Columbia



# HAUSFELD



## Stephanie Y. Cho

Associate

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Stephanie is an associate at Hausfeld's San Francisco office. She is currently representing corporate clients in commercial litigation in both *A.H.R.E., Inc. v. Hankook Jungsoo Industrial Co., Ltd.* (E.D.Va.) and *CAP Co., Ltd. v. Microsoft Corporation* (N.D.Cal.). She also represents a class of direct purchasers in the *In Re: Korean Ramen Antitrust Litigation*, *In Re: Cathode Ray Tube Antitrust Litigation*, and the *In Re: Optical Disk Drive Products Antitrust Litigation*. Stephanie is fluent in written and spoken Korean.

After law school, Stephanie worked as a judicial law clerk to the Honorable William P. Johnson, United States District Court for the District of New Mexico, where she gained exposure to a variety of civil and criminal matters. Among others, Stephanie handled dispositive motions concerning jurisdictional issues, Title VII, ERISA, APA and the Endangered Species Act, and Section 1983.

### EDUCATION

Cornell Law School, 2013

University of California Berkeley, *cum laude*, 2009

### BAR ADMISSIONS

California

District Court for the Northern District of California

## **Exhibit B**

In re Cathode Ray Tube (CRT) Antitrust Litigation  
**HAUSFELD LLP**  
 Reported Hours and Lodestar  
 Inception through October 31, 2016 – Mitsubishi/Thomson Only

**TIME REPORT**

NAME	TOTAL HOURS	HISTORICAL HOURLY RATE	LODESTAR
ATTORNEYS			
Christopher L. Lebsack (P)	1.10	\$670	\$737.00
Christopher L. Lebsack (P)	0.70	\$710	\$497.00
Michael P. Lehmann (P)	143.00	\$935	\$133,705.00
Michael P. Lehmann (P)	39.70	\$950	\$37,715.00
Michael P. Lehmann (P)	1.00	\$960	\$960.00
Brian A. Ratner (P)	0.30	\$610	\$183.00
NON-ATTORNEYS			
Candice Elder (PL)	11.30	\$300	\$3,390.00
Candice Elder (PL)	16.60	\$310	\$5,146.00
Candice Elder (PL)	0.40	\$320	\$128.00
<b>TOTAL:</b>			<b>214.10</b>
			<b>\$182,461.00</b>

(P) Partner  
 (OC) Of Counsel  
 (A) Associate  
 (PL) Paralegal  
 (LC) Law Clerk



## **Exhibit C**

## In re Cathode Ray Tube (CRT) Antitrust Litigation

**HAUSFELD LLP**

Reported Expenses Incurred on Behalf of DPPs - Mitsubishi/Thomson Only

<b>CATEGORY</b>	<b>AMOUNT INCURRED</b>
Court Fees (Filing, etc.)	
Experts/Consultants	
Federal Express	
Transcripts (Hearing, Deposition, etc.)	
Messenger Delivery	
Photocopies – In House (capped at \$0.20 per copy)	62.52
Photocopies – Outside	
Postage	
Service of Process	
Telephone/Telecopier	
<b>TOTAL:</b>	<b>\$62.52</b>